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June 23, 2021

VIA ECF AND HAND

Hon. Gabriel W. Gorenstein
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

Re: Mai v. Citigroup Global Markets Holdings Inc., 1:20-cv-11129-GBD-GWG (S.D.N.Y.)

Dear Judge Gorenstein:

We write on behalf of Defendant Citigroup Global Markets Holdings Inc. (“CGMHI”) to notify the Court that CGMHI’s May 11, 2021 motion to dismiss the complaint in the above-referenced action (ECF Nos. 25-27 (the “Motion”)) is fully-submitted and unopposed.

Pursuant to the Court’s April 13, 2021 Order (ECF No. 22), the parties agreed to a briefing schedule for the Motion which was set forth in CGMHI’s Notice of Motion (ECF No. 25) in accordance with Your Honor’s Individual Practices (Rule 2(B)) and in the parties’ correspondence annexed hereto as Exhibit A. Pursuant to the agreed-upon schedule, Plaintiff’s opposition to the Motion was due June 8, 2021 and CGMHI’s reply, if any, would have been due June 22, 2021. Plaintiff submitted no opposition to the Motion and the Motion is now fully-submitted and unopposed.

Further, in accordance with the Court’s Individual Practices, CGMHI respectfully submits courtesy copies of its Notice of Motion, Memorandum of Law and the Declaration of Samuel J. Rubin in Support of its Motion which were filed with the Court on May 11, 2021 (ECF Nos. 25-27) during a time when the Court’s webpage directed litigants not to supply courtesy copies due to COVID-19 restrictions.

Respectfully submitted,

/s/ Samuel J. Rubin

Samuel J. Rubin

Cc: Ivan Mai (*via ECF*)

EXHIBIT A

From: [Ivan Mai](#)
To: [Rubin, Samuel J.](#)
Subject: Re: Mai v. Citigroup Global Markets Holdings Inc. (S.D.N.Y. 20-cv-11129)
Date: Wednesday, April 21, 2021 1:59:41 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)

Sam Rubin

The schedule is acceptable.

Sincerely

Ivan Mai

From: Rubin, Samuel J. <SRubin@goodwinlaw.com>
Date: Wednesday, April 21, 2021 at 10:35 AM
To: Ivan Mai <MAIINUSA@HOTMAIL.COM>
Subject: RE: Mai v. Citigroup Global Markets Holdings Inc. (S.D.N.Y. 20-cv-11129)

Dear Mr. Mai,

Following up on my email below, CGMHI intends to file its motion to dismiss and opening brief on May 11. Please let me know if you agree to the briefing schedule I have proposed below. Thank you.

Sam Rubin

Samuel J. Rubin



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From: Rubin, Samuel J.
Sent: Tuesday, April 13, 2021 1:02 PM
To: 'Ivan Mai' <maiinusa@hotmail.com>
Subject: RE: Mai v. Citigroup Global Markets Holdings Inc. (S.D.N.Y. 20-cv-11129)

Dear Mr. Mai,

Pursuant to Magistrate Judge Gorenstein's April 13, 2021 order on CGMHI's pre-motion letter (ECF No. 22), we are writing in accordance with the Court's Individual Practices (Individual Rule 2.B) to propose a briefing schedule for CGMHI's motion to dismiss. We propose allowing both sides four weeks to prepare their respective briefs in support and opposition to the motion and two weeks for CGMHI's reply. That would make: (i) CGMHI's opening brief in support of its motion to dismiss due May 11, 2021; (ii) your opposition to CGMHI's motion to dismiss due June 8, 2021; and (iii) CGMHI's reply brief in further support of its motion to dismiss due June 22, 2021. Please let us know if this is an agreeable briefing schedule. Thank you.

Sam

Samuel J. Rubin



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From: Rubin, Samuel J.

Sent: Monday, April 12, 2021 3:48 PM

To: 'Ivan Mai' <maiinusa@hotmail.com>

Subject: Mai v. Citigroup Global Markets Holdings Inc. (S.D.N.Y. 20-cv-11129)

Dear Mr. Mai,

Please see the attached letter filed with the Court today in the above-referenced action. Additionally, pursuant to Southern District of New York Local Rule 7.2 and Magistrate Judge Gorenstein's Individual Practices, attached please find authorities cited in the letter filed with the Court today that are unpublished or reported on computerized databases.

Sam Rubin

Samuel J. Rubin



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